

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DONALD HENKEL,
MARK HENKEL, and
RAYMOND PAPARELLA

Case No. 22 CR 58

Honorable Elaine E. Bucklo

**GOVERNMENT'S UNOPPOSED MOTION TO CONTINUE
PRETRIAL DEADLINES**

The UNITED STATES OF AMERICA, by its attorney, ANDREW S. BOUTROS, the United States Attorney for the Northern District of Illinois, respectfully moves to continue the pretrial deadlines in this matter, and states as follows:

1. In April 2022, defendants were charged in a superseding indictment with multiple counts of mail fraud, in violation of Title 18, United States Code, Section 1341; wire fraud, in violation of Title 18, United States Code, Section 1343; and/or witness tampering, in violation of Title 18, United States Code, Section 1512(b)(3), arising out of an alleged scheme to defraud victims, including art galleries, auction houses, and individual buyers, by false representations and concealment of material facts pertaining to works of art and memorabilia. Dkt. 6. All three defendants are on pretrial release. Dkt. 25-27.

2. In January 2024, this Court set trial for January 6, 2025. Dkt. 72.

3. In May 2024, former counsel for defendant Mark Henkel moved to withdraw, and this Court appointed new counsel for Mark Henkel. Dkt. 75, 82-84.

4. In August 2024, former counsel for defendant Donald Henkel moved to withdraw, and this Court appointed new counsel for Donald Henkel. Dkt. 86-89.

5. In September 2024, this Court granted defendant Mark Henkel's unopposed motion to continue the trial date, resetting trial for October 20, 2025. Dkt. 91, 94.

6. In August 2025, this Court granted defendant Raymond Paparella's unopposed motion to continue the trial date, resetting trial for February 23, 2026. Dkt. 113, 115-16. The Court also set pretrial motions, proposed voir dire, agreed jury instructions, an agreed statement of the case, and witness and exhibit lists to be filed by December 12, 2025, with the final pretrial conference set for December 19, 2025. Dkt. 116.

7. Government counsel have been meeting with witnesses and preparing for trial and expect to be ready to proceed to trial on February 23, 2026. However, both government counsel have scheduled annual leave in November and December (11 and 12 days total, respectively). Additionally, in mid-October 2025, one of the two government counsel suffered fractures to her left hand, which required treatment at an emergency room and by an orthopedic surgeon. Government counsel was required to wear a brace—for approximately six weeks—which completely disabled her from being able to type or otherwise use her hand. Counsel also had to take an unexpected amount of sick leave in order to attend regular doctor's appointments, which are

ongoing, to follow up on her injury and recovery. As a result, the government requires additional time to finalize preparation of its pretrial filings.

8. In light of the above, the government respectfully requests an approximately one-month continuance of the pretrial deadlines (and to reset the final pretrial conference accordingly), subject to the Court's availability, while maintaining the current February 23, 2026 trial date.

9. The government has conferred with defense counsel for all three defendants, all of whom have no objection to continuing the pretrial deadlines and the final pretrial conference by approximately one month.

Respectfully submitted,

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